

EXHIBIT B

April 09 2021 10:12 AM

KEVIN STOCK
COUNTY CLERK
NO: 21-2-05430-9

SUPERIOR COURT OF WASHINGTON FOR PIERCE COUNTY

BONNIE MARKWELL,

Plaintiff,

vs.

WALMART INC.,

Defendant.

No.

SUMMONS

TO THE DEFENDANT:

A lawsuit has been started against you in the above-entitled Court by the above Plaintiff. Plaintiff's claim is stated in the written Complaint, a copy of which is served upon you with this Summons.

In order to defend against this lawsuit, you must respond to the Complaint by stating your defense in writing, and by serving a copy upon the person signing this Summons within twenty (20) days after the service of this Summons or sixty (60) days if you are served outside of the State of Washington, excluding the day of service, or a Default Judgment may be entered against you without notice. A Default Judgment is one where plaintiff is entitled to what it asks for because you have not responded. If you serve a Notice of Appearance on the undersigned person, you are entitled to notice before a Default Judgment may be entered.

SUMMONS - 1

ANDERSON HUNTER LAW FIRM, P.S.

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JAF/21334-1/1105844

E-FILED
IN COUNTY CLERK'S OFFICE
PIERCE COUNTY, WASHINGTON

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NO: 21-2-05430-9

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BONNIE MARKWELL,

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COMPLAINT

Plaintiff, by and through her counsel of record, alleges as follows:

1. Plaintiff Bonnie Markwell is a resident of Pierce County, Washington.

2. Upon information and belief, defendant Walmart Inc. is an American multinational retail corporation that operates a chain of hypermarkets, discount department stores, and grocery stores from the United States, headquartered in Bentonville, Arkansas. Walmart does business in Pierce County, Washington.

3. Plaintiff was shopping in the Bonnie Lake Walmart on January 14, 2021, in Pierce County, Washington.

4. This Court has jurisdiction over this cause and venue is proper.

5. When plaintiff existed the Walmart store she fell in a hole/depression in the Walmart parking lot and was injured as a result. The hole/depression existed for enough time for Walmart to have been on notice of this potentially dangerous condition.

COMPLAINT - 1

JAF/21334-1/1105774

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7. As a result of plaintiff's fall in the Bonnie Lake Walmart parking lot, plaintiff fractured her femur and sustained serious injuries. Plaintiff has incurred medical expenses and other consequential damages because of her fall.

WHEREFORE, the plaintiff is requesting all relief allowed by law, plus such other relief as the Court deems just and equitable.

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DATED this 8th day of April, 2021.

ANDERSON HUNTER LAW FIRM, P.S.

By John A. Follis, WSBA #18513
Attorneys for Plaintiff

COMPLAINT - 2

JAF/21334-1/1105774

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